Comment	Current Response
LEVEL OF DETAIL	
CM1 analysis lacks detail and isn't project-level	EIR/EIS chapters have been revised to provide more detail related to CM1 impacts to ensure this conservation measure is evaluated at a project level. Additional location details are currently being added to impact analyses about the location of impacts. CM's 2-22 are evaluated at a program level.
Impacts should be broken out on jurisdictional basis (i.e. county-by-county, by reclamation districts, etc.)	Additional location detail has been added to the impact text. The Land Use chapter provides some impact analysis on a county-by-county level for changes in land use designations. Presenting impacts by county for other resource chapters has been determined not to be practical as it would greatly expand the size of the document and result in segmented impact statements. The EIR/EIS is required to assess impacts for all of the components of CM1 combined. A county-by-county assessment would arbitrarily segment impacts based only on its county location which would unnecessarily complicate assessment of CM1 impacts.
Graphics are not detailed enough, need more detail for CM1.	Detailed map books have been created for relevant resource chapters and more figures have been added to address the need for a greater level of detail for some of the impact analyses.
AGRICULTURAL RESOURCES	
Provide mitigation measures for forebay seepage and offsite mitigation at more than 1:1 ratio	Mitigation measures for Agricultural Resources have been greatly revised since the February 1st Administrative Draft EIR/EIS. The potential for seepage from CM1 forebays has been addressed by modifying designs to include toe drains and cutoff walls to reduce seepage issues in adjacent agricultural areas. The Intermediate Forebay has also been relocated to a location closer to the Stone Lakes Refuge.
Include analysis of agricultural impacts from truck traffic, shade, and drainage issues	No additional analysis has been provided for potential impacts on agriculture from truck traffic or shade. Construction truck traffic is not expected to directly or indirectly effect agricultural land or production because construction trucks would be limited to major roadways and designated haul routes. The potential for traffic impacts from vehicles (those used in agricultural operations or for construction) is addressed in Transportation and the potential for dust impacts from vehicles is addressed in the Air Quality

	chapter. No direct or indirect loss of agricultural land would result. Effect of shade related to embankments or CS 1 facilities would not be expected because facility components (such as intakes and pumping plants) would be located within a facility compound separated from agricultural uses. The potential for impacts to agricultural drainage is addressed in the Agricultural Resources and Groundwater chapters
Include analysis of agricultural effects upstream of the Delta	Based on the current analysis, BDCP implementation would not result in any agricultural resources effects in areas north of Delta for most of the alternatives because none of the CM1 conveyance facilities are located in these areas, no change to water operations in upstream areas would result from the alternatives, except for Alternative 8. Alternative 8 analyses are being updated to indicate that additional reliance on groundwater pumping could be needed that could affect agriculture north of the Delta. The EIR/EIS is also being updated to include additional qualitative analysis for the potential or limited water transfers to occur under the BDCP.
Follow local agricultural mitigation requirements as per general plans	A detailed agricultural resources mitigation program has been developed to address impacts on agricultural land.
LAND USE	
Provide a more complete evaluation of compatibility with general plan policies	More detail has been added about land use designation changes and compatibility with general plan polices in the Land Use chapter.
Analyze and mitigate for project elements which divide communities and impair access	Impact LU-3 has been revised and mitigation measures have been applied to address these effects particularly near the community of Hood.
WATER QUALITY	
Goal of BDCP should be to minimize adverse impacts on water quality; also, NDWA water quality must be protected before exports can occur according to the NDWA/DWR agreement	The EIR/EIS Water Quality Chapter evaluates the potential for impacts to beneficial uses at 11 locations in the Delta for a substantial number of water quality constituents. In many locations no or very small water quality changes have been identified for BDCP alternatives. The current analysis does indicate that a number of water quality impacts could occur during certain water year types (i.e. South Delta salinity). Alternative 4 which may be identified as the proposed project is currently being revised in ways that could affect Delta water quality. This analysis is pending an Alternative 4 operations scenario agreement.
Evaluate whether withdrawal of more freshwater	The current analysis fully evaluates the water

from the eastern Delta for east alignment alternatives, would result in reduced Water Quality in the southern and western Delta.	quality effects of eastern alignment alternatives at an equal level of detail as other conveyance alignment alternatives. The analysis currently indicates that salinity effects under certain water year types would occur in the southern and western Delta.
Mercury impacts analysis is inadequate (especially re CMs within the Yolo Causeway)	Analyses of Mercury effects are currently being incorporated into the Water Quality Chapter.
WATER SUPPLY	
Consider adverse impact to senior appropriators, since water with increased salinity will cease to support crops currently grown in the Delta	See water quality responses above.
BDCP should address San Joaquin River issues (including flow requirements for upper SJ River, Stanislaus, Tuolumne, and Merced)	The current scope of the BDCP does not include a conservation strategy or covered actions for areas outside the legal Delta and Suisun Marsh. However, existing and reasonably foreseeable San Joaquin River issues and projects were considered under the Cumulative analysis as appropriate.
SURFACE WATER	
CEQA baseline should include Fall X2	EIR/EIS Chapter 4 has been revised to provide a more detailed explanation of the CEQA baseline assumptions and decision not to include Fall X2 assumption as part of the CEQA existing conditions. The following is an excerpt from chapter 3: *As of spring 2011, when a lead agency technical team began a new set of very complex computer model runs in support of this EIR/EIS, DWR determined that full implementation of the Fall X2 salinity standard was far from certain to occur prior to project approval because of a recent court decision and hydrological conditions. As of that date, the United States District Court in litigation filed by various water users over the delta smelt BiOp had found invalid the basis for the Fall X2 location and its implementation was uncertain in the foreseeable future. In addition, it was uncertain if hydrological conditions and precipitation levels sufficient to trigger the Fall X2 requirement would occur prior to the then-projected date of final action on the BDCP (i.e., early 2013)[1]. These uncertainties lead to the decision to use a CEQA baseline without the implementation of the Fall X2 action in this draft EIR/EIS. However, for NEPA purposes, which uses a different method for assessing environmental*

[1] In October 2011, the federal District Court issued an injunction applying Fall X-2 at 79 kilometers for October and November 2011.

	effects of the action alternatives, the Fall X2 action is included in the NEPA baseline as discussed below.
ALTERNATIVES SCREENING *(please see Alternative Development Report for more detailed discussion/explanation. Alternatives that were chosen for analysis in this EIR/EIS may meet the purpose and need to varying degrees)*	
Evaluate alternatives that do not require North Delta diversions	The Alternatives Screening Report addresses a broad range of potential alternatives to be addressed in the EIR/EIS including alternative locations for new intakes. These locations were determined to be infeasible for reasons disclosed in this report. The EIR/EIS does evaluate Alternative 9, Through Delta/Separate Corridors, an alternative that does not include North Delta diversions.
Alternatives are inconsistent with co-equal goals because they result in reduced water supply reliability for in-Delta water users like CCWD, ECCID, and other riparians	The EIR/EIS includes a reasonable range of alternatives that have been determined to meet the purpose and need and project objectives for the BDCP which encompass the BDCP co-equal goals. The potential for water quality impacts in portions of the Delta that have historically seen effects, such as for salinity are addressed for all of the alternatives and mitigation measures to reduce those effects are proposed to reduce the impacts.
Alternatives that reduce fall outflows or that affect Delta water quality and supply should not be considered	The EIR/EIS presents a reasonable range of alternatives that have incorporated a range of fall outflows based on a detailed alternatives development process aimed at balancing the co-equal goals of water supply reliability and Delta ecosystem health.
Other alternatives should be considered related to off-stream storage, San Joaquin River flow improvement, western Delta diversions, Clifton Court Forebay screens etc.	The draft Alternative Development Report addresses how alternatives were screened and reasons for rejecting or advancing them for evaluation in the EIR/EIS. The reasons for screening these potential alternatives from EIR/EIS will be fully disclosed. Although not selected for analysis in this EIR/EIS, some of these proposed alternatives will be analyzed in supplemental documentation as potential future actions in support of the coequal goals.
Explain how CMs were screened and how they work together to enhance beneficial effects	See response above.